

IN THE UNITED STATE DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

RECEIVED  
SO. DIST. CT. OFFICE  
2022 OCT 32 PM 2:13

\_\_\_\_\_  
John Doe :  
:  
Plaintiff, :  
:  
Civil Action No.  
- v. - :  
UNITED STATES ATTORNEY'S OFFICE :  
86 Chambers St. New York, NY 10007 :  
Defendant. :  
\_\_\_\_\_X

22 CV 09358

RECEIVED  
SO. DIST. CT. OFFICE  
2022 NOV -1 PM 3:15

**COMPLAINT**

Plaintiff., brings this action against Defendant United Estate of America and U.S. Attorney's office to compel compliance with the Foreign Corrupt Practice Act, as amended, 15 U.S.C. § 78dd-1, and Foreign Narcotics kingpin Designation Act and the implementing regulations (31 C.F.R. Part 598). As grounds therefor, Plaintiff alleges as follows:

**JURISDICCION AND VENUE**

1.-The Court has jurisdiction over this action pursuant to 5 U.S.C. § 552(a)(4)(B) ; 28 U.S.C. § 1331; 21 U.S.C. §§959(a), 960a, 963,853, 970; 18 U.S.C. §§ 924, 3238, 2, 371, 1956, 3238, 21 U.S.C. §§ 1904, 1906; 50 U.S.C. § 1705. S.1346 Crime Against Humanity Act of 2010.

2.-Venue is proper in this district pursuant to 28 U.S.C. § 1391(e). Under the same actions, S5 19 Cr. 144 (AKH), S2 11 Cr. 205 (AKH), 20 MAG 5469.

### **PARTIES**

3.-Sealed Plaintiff., (hereinafter referred to as “Plaintiff”). Plaintiff is a not-for-profit, human Rights organization incorporated under the laws of Florida. Plaintiff seeks to promote transparency, justice, respect to Human Rights, accountability, and respect rule of law. Plaintiff requests an investigation from federal agencies pursuant President Joe Biden Executive orders 14059 and 14060. Plaintiffs present the information collected on the newspaper and digital media. But a deep investigation is needed based on the frame of this activity.

4. Defendant UNITED STATES ATTORNEY’S OFFICE is an agency of the United States Government. Defendant has possession, custody, and has the access to information and control of records to which Plaintiff seeks investigation. Defendant is headquartered at 86 Chambers St. New York, NY 10007.

### **STATEMENT OF FACTS**

5. On December 15, 2021 president Joe Biden presented Executive order 14060 Establishing the United States Council on Transnational Organized Crime (USCTOC), and EO 14059 Imposing sanctions on Foreign Persons Involved in the Global Illicit Drug Trade.

Plaintiff request to the UNITED STATES ATTORNEY’S OFFICE for the Southern District of New York investigate high- ranking public officials in Bolivia and elsewhere, who have participated in, among other things, narco-terrorism, large scale drug trafficking, and weapons offenses relating to the importation of cocaine into the United States. The “*Cartel de las Estrellas*” was compromised of high-ranking Bolivian Officials who abused the Bolivian people and corrupted the legitimate institutions of Bolivia, including parts of the military, intelligence apparatus, legislature, and the judiciary system to facilitate the importation of tons of cocaine

into the United States. Evo Morales Ayma, the former president of Bolivia, Álvaro García Linera former Vice-president. and others members: Juan Ramon de la Quintana, Carlos Romero, Sacha Llorenti, and others.

6.- Under the leadership of Morales Ayma and others, the " *Cartel de las Estrellas* " joint forces with the " *Cartel de los Soles* " (1) sought not only to enrich its members and enhance their power, but also to "flood" the United States with cocaine and inflict the drug's harmful and addictive effects on users in this country, prioritized using cocaine as a weapon against America and importing as much cocaine as possible into the United State.

#### **Narco-Terrorism Conspiracy.**

7.- In 2006 Venezuela's Hugo Chavez worked to flood the U.S. with cocaine (2) and Morales Ayma played an important role. Morales Ayma put his government at the service of drug trafficking who brought him to the presidency. He went so far as to turn the Bolivian state into a narco-state (3)(4)(5).

8.-From at least in or about 1980, up to and including in or about 2022, Bolivian former president Morales Ayma is also president of the coca growers' federations in the " *Chapare* " region of Bolivia one of the major coca-growing areas in Bolivia, Since 2006 to 2022, coca cultivation increased from 26,000 hectares to 40,000 hectares, potential to produce 312 tons of cocaine, but it is not known exactly why protected areas and ecological parks have been deforested and ceded to criminal organizations related to his political party

1.- [https://en.wikipedia.org/wiki/Cartel\\_of\\_the\\_Suns](https://en.wikipedia.org/wiki/Cartel_of_the_Suns)

2.- <https://www.wsj.com/articles/venezuelas-hugo-chavez-worked-to-flood-u-s-with-cocaine-u-s-prosecutors-say-11568557780>

3.- <https://intdemocratic.org/bolivia-a-narco-state-whose-foreign-policy-defends-narcotics-trafficking-2/>

4.- <https://elorientalbo.com/por-que-bolivia-es-un-narcoestado/>

5.- <https://www.wsj.com/articles/morales-made-bolivia-a-narco-state-11574018858>

for illegal cultivation (6)(7). On September 17, 2022 President Biden complains that Bolivia do not fight drug trafficking.

9.-In or about 2022 President Luis Arce Catacora, Remy González, Eduardo del Castillo, violating Bolivia's laws and constitution, they create an illegal coca market by imposing a member of their party, Arnold Alane's at the head of this illegal market. (8)(9)

10.-Morales Ayma's decision to expel DEA in January 2009 from Bolivia (10) difficult the evaluation of the current drug trafficking situation in Bolivia. However, reports obtained from neighboring countries have revealed a number of alarming trends, including an increase in Bolivia cocaine production and the increased presence of Colombian, Brazilian, Peruvian, Venezuelan and Mexican drug traffickers operating throughout the country. These trends are the highest in over a decade and are attributed to a number of factors: (11)

a) Protection of the government granting Id's and passports with another identity. (12)

b) Allowing money laundering by making investments in properties, clinics and soccer teams and more. (13)

6.- <https://www.lostiempos.com/actualidad/pais/20220715/eeuu-bolivia-se-cultivaron-39700-hectareas-coca-2021>

7. <https://www.whitehouse.gov/ondcp/briefing-room/2022/07/14/ondcp-releases-data-on-coca-cultivation-and-production-in-the-andean-region/>

8.-<https://eju.tv/2022/06/ministro-reconoce-nuevo-mercado-de-coca-ilegal-en-la-paz-y-no-tiene-resolucion-ministerial/>

9.-<https://www.youtube.com/watch?v=hysslziA1gw>

10. <https://thegoodlylawfulsociety.org/bolivia-kicks-out-us-drug-enforcement-agency-drug-crime-rates-immediately-plummet/>

11.-<https://www.youtube.com/watch?v=WhUBxDaUMws>

12.-<https://insightcrime.org/news/analysis/the-flight-and-capture-of-a-cartel-man/>

13.- [https://correodelsur.com/deporte/20170817\\_narco-romero-sale-al-frente.html](https://correodelsur.com/deporte/20170817_narco-romero-sale-al-frente.html)

c) It has the logistics for the production and export of cocaine, “*the Chapare*” has an international airport, chemical precursors, the Urea factory all for the initiative of Morales Ayma.

d) Judges and Government release from jail, remove from the list of Interpol, and more. that illustrate the corrupting influence of cocaine production and trafficking.

11.- In or about August, 2018 during a visit to the “Tipnis”, the Commission of the International Tribunal on the Rights of Nature, Carlos Romero described the Chapare as an “Independent State” region where the law is not respected. 90% of the coca from the “*chapare*” does not go through the legal market and is used to produce cocaine. (14).

12.-Many evidence suggests that the government officials may be complicit in the drug trade.

For example, Rene Sanabria-Oropeza pled guilty to drug trafficking charges stemming from his attempt to import over 100 kilograms of cocaine into the U.S. At the time of his arrest in February 2011, was the Director of the Narcotics Intelligence Unit within the Ministry of Government and also head of the Bolivian National Police anti-narcotics unit, known as FELCN. (15)

13.- Maximiliano Davila-Perez a/k/a “Macho” has an Indictment in the Southern District of New York. S9 19 Cr. 91 (DLC). (16).

14.- The Former president of Colombia Andres Pastrana accused Morales Ayma of being one of Pablo Escobar’s suppliers when he led Medellin Cartel. (17)

14. [https://eldeber.com.bo/opinion/la-republicueta-de-chapare\\_70339](https://eldeber.com.bo/opinion/la-republicueta-de-chapare_70339)

15.- <https://www.wsj.com/articles/SB10001424053111903703604576589390650678946>

16. <https://www.youtube.com/watch?v=tpUuHbSdYpY&list=PLzXbp5XB3NUOeABffudGi3tZIRFnwHKC4&index=6>

17.- <https://www.youtube.com/watch?v=ujM4xd1MXEg>

15.- Pablo Ramos Lima, was a candidate for deputy for the party of Morales Ayma for a day 07/10/2014, removed the next day after knowing in the press his record was linked to drug trafficking. (18). Carlos Romero would have been Godfather of Marriage of Ramos Lima; at the end he was arrested for drug trafficking on 11/03/2014.

16.- Rene Navia Arancibia and his son Rene Navia Gorena, were police officers involved in 11 processes ranging from drug trafficking to murder, they are currently businessmen in Santa Cruz.

17.-The "*Cartel de las estrellas*" negotiated multi-ton shipments of "*chapare*" produced cocaine; the "*Cartel de Los Soles*" provide military-grade weapons to the FARC; coordinated foreign affairs with Cuba and other countries to facilitate large scale drug trafficking; and solicited assistance from FARC leadership in training an unsanctioned militia group that functioned, in essence, as an armed forces unit for the Cartel de Los Soles and this route is designed as "ALBA route" a drug trafficking scheme between Bolivia, Venezuela and Cuba . (19)

18.- There is currently a dispute for control of power and drug trafficking between Morales Ayma and current President Arce Catacora. Recently Rolando Cuellar a congressman of the group of Arce Catacora presented a letter attributed to the vice president of the "*Movement al Socialism (MAS)*" Gerardo García in which Jose Miguel Farfan known as the "*Chapo of the Southern Cone*" is thanked for the "great" and "generous contributions" for electoral campaigns of his political party. (20). Rolando Cuellar asks to summon former Minister Carlos Romero to

18.-<https://www.lostiempos.com/persona/pedro-montenegro-paz>

19.- <https://www.abc.com.py/edicion-impresa/internacionales/ruta-del-alba-de-narcotrafico-entre-bolivia-venezuela-y-cuba-1702109.html>

20.- <https://www.paginasiete.bo/nacional/cuellar-denuncia-financiamiento-narco-al-mas-con-carta-atribuida-a-gerardo-garcia-FI3028263>

unveil a second letter of narco-contributions. (21)

19.- Germán Cardona Álvarez, denounced in 2015 that Morales Ayma formed the "*Cartel de las estrellas*", just as the "Cartel of the Suns" operates in Venezuela. Juan Ramon de la Quintana was the one who coordinated the arrival of planes from Venezuela to the Chapare International Airport and left weapons for the pluractional guard. (22)

20.- Pedro Montenegro Paz's cartel would be protected by Morales Ayma, Carlos Romero. Colonel Gonzalo Medina Sánchez and Captain Fernando Moreira Morón and several others such as Kurt Brun and an entourage of judges, members and magistrates who in exchange for their services enjoyed a life of luxury (23). Former Foreign Minister Diego Pary denied to the press that Brazil was processing the extradition of Montero Paz, while he had three unanswered requests from the Brazilian embassy on his desk. In 2015, Brazil concluded the extradition process with a ruling by the Supreme Court of Justice. A family judge from Cotoca, Federico Jiménez Rua, changed the text of the sentence and released him and the red stamp of Interpol turned blue. Montenegro Paz, who allegedly has ties to the former head of the Special Force to Fight Crime (FELCC) of Santa Cruz, Gonzalo Medina, was in Panama, Cartagena and Argentina (24).

21.- The Brazilian magazine "*Veja*" denounced in 2010 the visit of the then minister of Evo Morales, De la Quintana and the candidate of the MAS, Jessica Jordán, to the home of

21. [https://correodelsur.com/seguridad/20220929\\_diputado-cuellar-pide-a-la-fiscalia-citar-a-romero-por-develar-segunda-narcocarta.html](https://correodelsur.com/seguridad/20220929_diputado-cuellar-pide-a-la-fiscalia-citar-a-romero-por-develar-segunda-narcocarta.html)

22.- <https://oxigeno.bo/seguridad/8712>

23.- <https://www.youtube.com/watch?v=aMA3ZP5Eu5g>

24 <https://www.lostiempos.com/actualidad/pais/20190424/interpol-montenegro-paso-panama-cartagena-argentina>

Maximiliano Dorado in Santa Cruz. After that "courtesy visit" they left carrying two briefcases, according to the confidential report of the Bolivian police, cited by the magazine (25).

22.- Police chiefs Fernando Moreira and Gonzalo Medina, protected Jose Gonzalez Valencia, member of the Jalisco Cartel New Generation (26)(27).

23.- Former government minister Arturo Murillo detained in Florida confirmed that Iván Archivaldo Guzmán Salazar, son of "Chapo" Guzmán, the boss of the powerful and feared Sinaloa cartel, settled in Bolivia between 2014 and 2015. He claims that Guzmán did pilot studies in Santa Cruz and visited Congress, with a credential issued by the Government of Morales Ayma (28).

24.- Many militants of the political party of Morales Ayma were discovered with their hands on drugs so many that these facts lost informative importance. From the mayor of Chacarilla, Germán Gutiérrez García, arrested with a kilo of drugs, through another mayor, that of Catacora, Justo Sanga, found with 173 kilos, to the contact of Evo to surround the cities, Justino Yucra, and some sisters of MAS deputies such as Máxima Arias Calderón, with 10 kilos, and many others.

25.- Teran clan: Margarita Teran was leader of the MAS despite the 145.7 kilos of base paste found on her family's property, in the community of San Isidro, jurisdiction of

25.-<https://insightcrime.org/news/analysis/the-flight-and-capture-of-a-cartel-man/>

26.-[https://eldeber.com.bo/santa-cruz/medina-y-moreira-detenidos-por-nexos-con-narco-extraditable\\_139651](https://eldeber.com.bo/santa-cruz/medina-y-moreira-detenidos-por-nexos-con-narco-extraditable_139651)

27.-[https://www.youtube.com/watch?v=pLgpmB\\_Q-fI](https://www.youtube.com/watch?v=pLgpmB_Q-fI)

28.-<https://elcomercio.pe/mundo/latinoamerica/ivan-archivaldo-guzman-hijo-de-el-chapo-guzman-estudio-en-bolivia-bajo-proteccion-de-evo-morales-segun-ministro-de-gobierno-arturo-murillo-noticia/>



Tiraque, on the way to Chapare. Two of his sisters, Juana and Elba, and his brother-in-law Tomás Veizaga, were arrested during that operation in 2008. They were only 99 days imprisoned in the Sacaba prison. Judge José Luis Dávila released them after each one paid a bail of 50,000 bolivianos, a figure that does not exist in Law. Rómer Gutiérrez Quezada fell with 100 kilos in Sao Paulo Gutiérrez Quezada was photographed with the entire dome of the MAS and in many of those photos he appears embracing Evo Morales Ayma. He traveled constantly to Brazil and it was learned that he was processing the appointment of consul in the capital where he was arrested. He is the brother of an alternate deputy and was an advisor to Santa Cruz Councilman Melody Tellez.

26.- Ministry of Justice Alvaro Coimbra, filed a complaint against the MAS militant, Dora Vallejos, for the alleged commission of the crime of illicit enrichment of 150 million dollars, which would be the amount of her assets and movement of money. The links with drug trafficking that the accused could have been investigated, since her husband, Bismarck Padilla, was sentenced for that crime, but also her relationship with one of the pilots who was arrested in Mexico with a ton of cocaine. (29).

27.- The economic power of the "Chapare" is so great that Morales Ayma organized "The EVO Cup 2022 sub-17" with the support of the Bolivian Football Federation and the six Federations of Chapare (30) International events participated in Boca Jrs clubs. And River Plate (Argentina), Gremio (Brazil), Sporting Cristal (Peru), U Catolica (Chile), in addition to national clubs such as Bolivar de La Paz. (31) It was not specified how much they were paid or how they were paid

29.-[https://correodelsur.com/seguridad/20200205\\_gobierno-denuncia-a-mujer-militante-del-mas-vinculada-al-narcotrafico.html](https://correodelsur.com/seguridad/20200205_gobierno-denuncia-a-mujer-militante-del-mas-vinculada-al-narcotrafico.html)

30.-<https://www.lostiempos.com/deportes/futbol/20220705/copa-evo-2022-reune-12-clubes-cinco-paises>

31.-<http://www.cabildeodigital.com/2022/07/lanzan-la-copa-evo-2022-que-se-jugara.html>

28.-Mayerling Castedo was not only part of a Beni narco family, she was a close collaborator of Juan Ramon de la Quintana and an influential MAS prosecutor who in the 2015 subnational elections, all opposition candidates were annulled by the Electoral Tribunal. In this way, the MAS took over all the mayors and governorships of the department. Taking control of a strategic drug export point of cocaine. (32)

### **Means and Methods of the Narco-Terrorism Conspiracy**

29. In furtherance of the narco-terrorism conspiracy, at various times between in or about 1999 and in or about 2020, members of the conspiracy organized their drug-trafficking activities as follows:

a. Beginning in or about 2006, while the FARC was purporting to negotiate toward peace with the Colombian government, the FARC agreed with leaders of the Cartel de Los Soles to relocate some of its operations to Venezuela, Bolivia, Cuba, under the protection of the Cartel, and that the Cartel de Los Soles should instead use its other well-established drug routes and locations to dispatch cocaine

b. Members and associates of the FARC, operating under supervision of Morales Ayma and his political party MAS. In 2019 Facundo Molaes Schoenfeld, a/k/a "Camilo," Kills two Bolivian peoples, in Montero-Bolivia (33).

30.- Morales Ayma put together a "Terrorism Case" with the support of Venezuela, an

32. <https://urgente.bo/noticia/cae-una-narcofamilia-del-beni-que-transportaba-droga-per%C3%BA-y-paraguay>

33.- [https://videoencontexto.com/2021/12/alomarianela-facundo-molaes-vuelve-a-bolivia\\_wxrzv7-jius/](https://videoencontexto.com/2021/12/alomarianela-facundo-molaes-vuelve-a-bolivia_wxrzv7-jius/)

ambassador of Venezuela paid the tickets of who would recruit the alleged terrorist group that was later executed in an operation ordered by Morales Ayma, survivor releases a list of 93 people starting with Morales Ayma who would have armed the case. (34)(35). Attack that gave Morales Ayma a motive to persecute and imprison the opposition and perpetuate the narco-terrorist power of Morales Ayma and others. The Inter-American Commission on Human Rights classifies it as extrajudicial execution and other crimes. (36).

31.- Marco Camara denounced that the brother of Evo Morales Ayma, withdrew millions of Bolivians money with seals of the Central Bank of Bolivia and the Bank of the Union and in Santa Cruz, they changed them to dollars and from there they took them to Paraguay through the border crossing of Ibibobo. After the Resignation of Evo Morales Ayma 2019 as a result of a monumental fraud (37)(38), in his flight retired several armored trucks of the Central Bank of Bolivia and the Bank of the Union, two armored trucks collected the millions in Paraguay and some of it was taken to Mexico. If it is estimated that each armored car has a capacity of 500 million dollars, we can say that at least Evo Morales Ayma took a billion dollars, the result of drug trafficking, corruption and other illicit activities. (39). Money that is used to finance groups of repression and related to his narco-terrorism group.

34.- <https://eldeber.com.bo/pais/sobreviviente-al-asalto-en-el-hotel-las-americas-publica-lista-de-supuestos-involucrados-en-el-caso-166376>

35.- <https://www.youtube.com/watch?v=2D6jDOXgVvA>

36.- <https://www.oas.org/es/cidh/decisiones/2018/BOAD1172-09ES.pdf>

37.- <https://eldeber.com.bo/pais/el-congreso-de-eeuu-ratifica-el-informe-de-la-oea-sobre-el-fraude-electoral-en-bolivia-298737>

38.- <https://2017-2021.state.gov/the-organization-of-american-states-final-report-of-the-audit-of-the-elections-in-bolivia/index.html>

39.- [https://www.youtube.com/watch?v=Jwph1\\_fFodw](https://www.youtube.com/watch?v=Jwph1_fFodw)

**Acts in Furtherance of the Narco-Terrorism Conspiracy Between the Cartel de Los Soles-  
Cartel de las estrellas and the FARC**

32.- In furtherance of the narco-terrorism conspiracy and to affect the illegal objects thereof, the following overt acts, among others, were committed. In or about 2008, Bolivian peasant leader Felipe Quispe acknowledged his ties to the Revolutionary Armed Forces of Colombia (Fuerzas Armadas Revolucionarias de Colombia – FARC). Quispe, a former member of the Tupac Katari Guerrilla Army (EGTK), to which Vice President Alvaro Garcia Linera also belonged, admitted his contacts with late FARC leader Raul Reyes and his sympathy for the group. (40).

33.- In or about March 2011, Morales Ayma ordered the assassination of his pilot General German Valenzuela Lemaitre, chief of staff of the Bolivian Air Force (FAB), newspaper versions mention that Mr. Valenzuela asked Morales to no longer transport cocaine on FAB planes. Mr. Valenzuela was found DEAD and his body was cremated to hide evidence about his murder, Morales Ayma discovered that Mr. Valenzuela was already in contact with the DEA passing information on how Morales Ayma, Quintana, García Lineras and the political leadership that participated in the cocaine business that sent cocaine to Venezuela, Cuba, US. “VEJA” journalist Leonardo Coutinho mentions this death in his book “The Spectre” by Hugo Chávez. (41). Coutinho uses Marco Antonio Rocha as a source; military and pilot who lives in the United States. Who witnessed at least 10 flights to Venezuela and another 3 to Cuba and that the planes carried at least 500 kilos of cocaine on each flight and that Morales Ayma was aware of this activity. He claims that even Bolivian Air Force planes departing from El Alto military airport were used.

40.- <https://www.eluniverso.com/2008/07/25/0001/14/959ADA9006094476943FF7CAE8AEE891.html>

41.- <https://www.amazon.com/Hugo-Ch%C3%A1vez-espectro-venezuelano-narcotr%C3%A1fico-ebook/dp/B079XVR8HY>

### **Possession of Machineguns, Destructive Devices and Armed groups**

34.- From at least in or about October 2000, in a DEA-Bolivian Police operative there was a confrontation in the Chapare where David Andrade, Graciela Alfaro, Gabriel Chambi, Silvano Arroyo were kidnapped, tortured and executed by the Coca Trade Union Police. There are audios and witnesses that indicate that Morales Ayma ordered the execution. (42)

35.- Morales Ayma after starring in an electoral fraud in 2019 organized armed groups in the Chapare and La Paz called for confrontation and civil war. (43)(44)

### **Violation of human rights and crime against humanity**

36.- Morales Ayma is accused of alleged commission of sexual relation with a minor and she was pregnant for this event. (45) (46). Even in an audio he confesses that each coca grower union brings him a minor (47). Teacher Gabina Condori denounces rapes of Morales Ayma to girls of 11 and 14 years in the “*Chapare*” (48).

37.- Morales Ayma, after resigning in 2019, from Mexico, he orders to surround and leave without food to the cities. (49). State of Bolivia denounced Morales Ayma before the

42.-<https://www.youtube.com/watch?v=wufRPeLsaZw>

43.-<https://www.youtube.com/watch?v=O7nwa9jMYxE>

44.-<https://www.bing.com/videos/search?q=guerra+civil+bolivia&docid=607990202235705755&mid=B9A30E9ADDEFFA0DA168B9A30E9ADDEFFA0DA168&view=detail&FORM=VIRE>

45.-<https://www.youtube.com/watch?v=55Tg5VY4d5s>

46.-<https://www.youtube.com/watch?v=lHb1gnKCOFE>

47.-<https://www.youtube.com/watch?v=RdLCeAi9gqM>

48.-<https://www.pub.eldiario.net/movil/index.php?n=89&a=2020&m=01&d=19>

49.-<https://www.lostiempos.com/actualidad/pais/20191121/evo-mexico-ordena-cercar-dejar-alimento-ciudades>

International Criminal Court in The Hague for ordering blockades in August 2020 in the middle of the pandemic, blockades that caused the death of about 40 patients due to lack of medical oxygen in the middle of a health emergency. (50). On October 26, 2022 political leaders (MAS) threatened Santa Cruz with a siege preventing the passage of food and fuel. (51). Santa Cruz de la Sierra demands a “Census” that was projected for this 2022, but the government wants to carry it out in 2024, after exhausting the dialogues and negotiations, Santa Cruz went on strike on 10/22/2022 in protest, the government is seeking confrontations and is mobilizing public employees from all departments such as military personnel to seek a confrontation, something that is unconstitutional, Morales Ayma imposed his norms and with the approval of the Electoral Tribunal, Morales Ayma requires that all Government employees must be registered with his political party and be under his command, including the President of the Republic, which leads us to an extension of a narco-terrorist dictatorial regime. Our human rights organization holds President Luis Arce Catacora and the Cartel de las Estrellas, led by Morales Ayma, responsible for all the injuries and deaths resulting from this confrontation. (52). Parliamentarians denounce a plan for the violent takeover of the department. (53) Edgar Montano continues to threaten his violent plan and even threatens to take over all private companies. They are looking for fatalities to justify a state of siege. If this critical outcome occurs, it would give it an “***Emergency Motion***” character, which would give it an “**Urgent or critical**” character to this request.

WHEREFORE, Plaintiff respectfully requests that the Court: (1) order Defendant to conduct searches for any and all records to verify all the information presenting for the Plaintiff’s request and demonstrate that it employed search methods reasonably likely to lead to the discovery of records responsive to Plaintiff’s request; (2) order Defendant to produce, by a date certain, any and all nonexempt records responsive to Plaintiff’s E.O. 14059 & 14060 request

and Vaughn indices of any responsive records withheld under claim of exemption; (3) enjoin Defendant from continuing to withhold any and all non-exempt records responsive to Plaintiff's request for analysis and found where the money took it by Evo Morales Ayma Is ; (4) grant Plaintiff an award of attorneys' fees and other litigation costs reasonably incurred in this action; (5) grant Plaintiff access to DEA and USAID infrastructure in Bolivia to use in defense of human right , humanitarian assistance and defense of democracy; (5) grant Plaintiff such other relief as the Court deems just and proper.

Respectfully.

October 31, 2022.

John Doe

50.-<https://www.france24.com/es/20200904-bolivia-evo-morales-cpi-lahaya>

51.-<https://www.lostiempos.com/actualidad/pais/20221026/civicos-del-pais-repudian-califican-criminal-cerco-santa-cruz>

52.- [Denuncian que el MAS traslada a funcionarios a cabildo en Santa Cruz; desde el oficialismo niegan - El País - Opinión Bolivia \(opinion.com.bo\)](#)

53.- [Diputado Bazán denuncia que el MAS busca criminalizar a quienes encabezan el paro multisectorial | El Deber](#)